

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ILANA KOPMAR, DIANE T. CLARKE,  
And ISAAC ALTMAN,

Plaintiffs,

v.

ASSOCIATION OF LEGAL AID ATTORNEYS,  
AMALGAMATED LOCAL UNION 2325 OF THE  
INTERNATIONAL UNION, UNITED AUTOMOBILE  
AEROSPACE AND AGRICULTURAL IMPLEMENT  
WORKERS OF AMERICA (UAW), AFL-CIO and  
DANIELLE WELCH, GERALD KOCH, EVA  
STEVENSON, CANDACE GRAFF, LISA OHTA, BRET  
J. TAYLOR, EMILY C. EATON, MARTYNA  
KAZNOWSKI, JEREMY BUNYANER, IOANA CALIN,  
GILLIAN R. KRESS, PUJA PAUL, JACQUELINE  
AGUILAR, BABATUNDE AREMU, CASE  
BOHANNON, MICHAEL GIBBONS, ALEXANDER  
HU, KELSEY LAING, MARTHA MENENDEZ,  
HALLIE MITNIK, SEAN T. PARMENTER, IAN  
SPIRIDIGLIOZZI, DOROTHY SUMMERS, TANNER  
WEILAND, TORI ROSEMAN, ANDREW SPENCE,  
COLLEEN FOLEY, and JULIA JENKINS,

Defendants.

No. 1:24-cv-05158 (JPO)

**JOINT STIPULATION AND [PROPOSED] ORDER  
EXTENDING TIME TO RESPOND TO COMPLAINT**

WHEREAS, Plaintiffs Ilana Kopmar, Diane T. Clarke, and Isaac Altman filed a complaint in the above-captioned action on July 8, 2024 (the “Complaint”);

WHEREAS, Plaintiffs effectuated service of the summons and Complaint upon Defendant Association of Legal Aid Attorneys, UAW Local 2325 and individual Defendants Danielle Welch, Gerald Koch, Eva Stevenson, Candace Graff, Lisa Ohta, Brett J. Taylor, Emily C. Eaton, Martyna Kaznowski, Jeremy Bunyaner, Ioana Calin, Gillian R. Kress, Puja Paul, Jacqueline Aguilar, Babatunde Aremu, Case Bohannon, Michael Gibbons, Alexander

Hu, Kelsey Laing, Martha Menendez, Hallie Mitnik, Sean T. Parmenter, Ian Spiridigliozzi, Dorothy Summers, Tanner Weiland, Tori Roseman, Colleen Foley, and Julia Jenkins (collectively, “Represented Defendants”).

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between each of the parties through their undersigned counsel as follows:

1. The time for the Represented Defendants to move or answer the operative Complaint is hereby extended to and including September 27, 2024.
2. The Represented Defendants hereby waive any and all jurisdictional defenses based on lack of subject matter jurisdiction and lack of personal jurisdiction including but not limited to insufficient process or insufficient service of process. Subject to the foregoing waivers by the Represented Defendants, the Represented Defendants expressly reserve all other rights, defenses, or other objections, including but not limited to failure to state a cause of action, and lack of subject matter jurisdiction.

Dated: New York, New York  
August 6, 2024

LIEB AT LAW

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*Counsel for Association of Legal Aid  
Attorneys UAW Local 2325*

SO ORDERED:

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Hon. J. Paul Oetken  
United States District Court Judge